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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 JUAN QUINTANILLA VASQUEZ and
11 GABRIELA PERDOMO ORTIZ, individually and
12 on behalf of all others similarly situated,

13 Plaintiffs,

14 vs.

15 LIBRE BY NEXUS, INC. and JOHN DOES 1-50,

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17 Defendants.

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19 **CONSUMERS LEGAL
20 REMEDIES ACT VENUE
21 DECLARATION**

22 I, Juan Quintanilla Vasquez, declare as follows:

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24 1. I am a named plaintiff in this litigation.
25 2. I have personal knowledge of the matters set forth below except to those matters stated
herein which are based on information and belief, which matters I believe to be true.
26 3. If called as a witness I could and would competently testify to the matters included herein.
27 4. I entered into a GPS tracking device lease agreement with Libre by Nexus on February 10,
2016.
28 5. I am informed and believe that venue is proper in this Court under California Civil Code §
1780(d) based on the fact that I reside in a county in this district.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct and that this declaration was executed on February 14, 2017 in Oakland,
3 California.

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6 By: Juan Quintanilla Vasquez
Juan Quintanilla Vasquez

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